

TREVOR J. HATFIELD, ESQ.
Nevada Bar No. 7373
HATFIELD & ASSOCIATES, LTD.
703 South Eighth Street
Las Vegas, Nevada 89101
(702) 388-4469 Tel.
(702) 386-9825 Fax
thatfield@hatfieldlawassociates.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMY REYNOLDS, an individual,

Plaintiff,

vs.

YB LAS VEGAS LLC D/B/A/ YARDBIRD
SOUTHERN TABLE & BAR. A FOREIGN
CORPORATION,

Defendant.

CASE NO: 2:21-cv-01618-JAD-NJK

**STIPULATION AND ORDER TO
SUBMIT ACTION TO BINDING
ARBITRATION, STAY ACTION
PENDING ARBITRATION,
VACATING DEFENDANT'S
MOTIONS [ECF NO. 12, and 13], AND
RETAINING THE COURT'S
JURISDICTION TO RULE UPON
DEFENDANT'S MOTION FOR
ATTORNEY'S FEES AND COSTS**

ECF Nos. 12, 13, 19

Plaintiff AMY REYNOLDS (hereinafter "Plaintiff"), by and through her counsel, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and YB LAS VEGAS LLC, d/b/a YARDBIRD SOUTHERN TABLE & BAR (hereinafter "Defendant"), by and through its counsel, Deverie J. Christensen, Esq., of the law firm of Jackson Lewis P.C. do hereby stipulate and agree as follows:

1. On August 31, 2021, Plaintiff filed her Complaint (ECF No. 1) against Defendant alleging claims of sex discrimination and retaliation, and the matter was assigned Case No. 2:21-cv-

1 01618-JAD-NJK (the “Action”). Plaintiff filed an Amended Complaint on September 15, 2021
2 (ECF No. 5), and Defendant filed its Answer on October 19, 2021.

3 2. On October 29, 2021, Defendant filed a Motion to Compel Arbitration (ECF No. 12),
4 Motion to Dismiss or Stay Proceedings (ECF No. 13), and Motion for Attorney’s Fees and Costs
5 (ECF No. 14). The deadline for Plaintiff to file oppositions to Defendant’s motions was extended to
6 November 19, 2021, by stipulation of the Parties as approved by the Court (ECF No. 18).

7
8 3. Plaintiff and Defendant have agreed the Parties entered into an arbitration agreement
9 requiring Plaintiff and Defendant to submit to final and binding arbitration any and all claims and
10 disputes that arise from or relate to Plaintiff’s employment or the termination of her employment
11 with Defendant (the “Arbitration Agreement”). The Parties agree the claims alleged by Plaintiff
12 against Defendant in the Action fall within the scope of the Arbitration Agreement.

13
14 4. Thus, the Parties have agreed that the Action, in its entirety *except* with respect to
15 Defendant’s Motion for Attorney’s Fees and Costs (ECF No. 14), shall be submitted to binding
16 arbitration pursuant to the terms of the Arbitration Agreement, with AAA; and Plaintiff will initiate
17 arbitration against Defendant with AAA.

18 5. The Parties agree the Court will retain jurisdiction and authority to rule upon
19 Defendant’s Motion for Attorney’s Fees and Costs (ECF No. 14) related to the filing of Defendant’s
20 Motion to Compel Arbitration (ECF No. 12) and Motion to Dismiss or Stay Proceedings (ECF No.
21 13), and Motion for Attorney’s Fees and Costs (ECF No. 14).

22
23 6. Defendant agrees to vacate Defendant’s Motion to Compel Arbitration [ECF #12]
24 and Motion to Dismiss [ECF #13] subject to reserving the right to pursue its attorney’s fees and
25 costs for filing such motions, as requested in Defendant’s Motion for Attorney’s Fees and Costs.
26 Defendant does not stipulate to vacate Defendant’s Motion for Attorneys’ Fees [ECF #14].
27
28

7. All proceedings in this Action shall be stayed, *except* with respect to Defendant's Motion for Attorney's Fees and Costs (ECF No. 14), and this Court shall retain jurisdiction over this Action pending the conclusion of the arbitration with AAA.

8. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated: November 19, 2021

Dated: November 19, 2021

HATFIELD & ASSOCIATES, LTD.

JACKSON LEWIS P.C.

/s/ Trevor J. Hatfield


/s/ Deverie J. Christensen

By: _____
Trevor J. Hatfield, Esq. (SBN 7373)
703 South Eighth Street
Las Vegas, Nevada 89101
Tel.: (702) 388-4469
Email: thatfield@hatfieldlawassociates.com
Attorney for Plaintiff

By: _____
Deverie J. Christensen, Esq. (SBN 6596)
Hilary A. Williams, Esq. (SBN 14645)
300 S. Fourth Street, Ste. 900
Las Vegas, Nevada 89101
Tel.: (702) 921-2460
Email: deverie.christensen@jacksonlewis.com
Email: hilary.williams@jacksonlewis.com
Attorneys for Defendant

ORDER

Based on the parties' stipulation [ECF No. 19] and good cause appearing, IT IS HEREBY ORDERED that **THIS ACTION IS STAYED pending binding arbitration**, except as to the pending motion for attorney's fees and costs [ECF No. 14]. The pending motions to compel arbitration and to dismiss [ECF Nos. 12, 13] are **DENIED** as moot.



U.S. District Judge Jennifer A. Dorsey
Dated: November 21, 2021